

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:24CR396 SEP
	)	
	)	
VENERA ISABELLE DUMITRU	)	
Defendant.	)	

**MOTION TO CONTINUE PLEA HEARING**

Comes now Defendant, Venera Isabelle Dumitru, through her attorney, Tara Crane, Assistant Federal Public Defender, and requests this Court continue the Plea hearing set for March 12, 2025, at 3:00 p.m. in this case. In support thereof, Defendant states the following:

1. On February 18, 2025, defendant waived pretrial motions, and the matter was transferred to District Judge Sarah Pitlyk for further proceedings. The matter was set for jury trial March 24, 2025, at 9:00 a.m.
2. Counsel for the defendant requested a plea date for this case on February 26, 2025, and the matter was set for a plea hearing on March 12, 2025, at 3:00 p.m. This date, however, does not show on CM/ECF.
3. Ms. Dumitru is from Romania. Although she speaks some English, she requires a translator for the more complicated legal matters counsel must discuss with her.

4. In anticipation of the plea date, counsel attempted multiple dates to be able to meet with Ms. Dumitru, who is being housed in the Grayson County Jail in Kentucky, with an interpreter to discuss her case and what would be happening during the plea proceedings before the court. The jail did not have available dates that were compatible with counsel's schedule prior to the plea date of March 12, 2025.
5. Counsel needs additional time to schedule this meeting with the client prior to the plea proceeding to make sure she understands her rights and potential questions the court will ask her during the court proceeding. Counsel believes she would be able to accomplish this meeting with the interpreter within three weeks.
6. A continuance in this matter is in the interest of justice as it allows reasonable time for counsel to be properly prepared pursuant to 18 U.S.C. §3161.
7. Counsel discussed her request for continuance with the attorney for the government, Assistant United States Attorney, Gwendolyn Carroll, who has no objection to her request

WHEREFORE, defendant requests this Court grant her request to continue the plea hearing for a period of three weeks or to another date convenient for this Court.

Respectfully submitted,

/s/ Tara Crane  
TARA CRANE #52206 MO  
Assistant Federal Public Defender

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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Gwendolyn Carroll, Assistant United States Attorney.

/s/ Tara Crane  
TARA CRANE  
Assistant Federal Public Defender